

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GM CASTING HOUSE INC.,

Plaintiff,

v.

FOREVER COMPANIES, INC.,

Defendant.

Civil Action No. 1:24-cv-1821

Honorable Jeffrey I. Cummings

JURY TRIAL DEMANDED

**MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANT, FOREVER
COMPANIES, INC.**

NOW COMES attorney Kenneth A. Matuszewski, pursuant to Local Rule 83.17, and hereby requests his withdrawal as counsel for Defendant Forever Companies, Inc. (“Defendant”).

In support hereof, Movant states as follows:

1. On April 9, 2024, Kenneth A. Matuszewski filed his Appearance as an attorney for Defendant while he was employed at Goldberg Segalla LLP as an associate attorney; Mr. Matuszewski left the employ of Goldberg Segalla in June 2024. *See* Dkt. No. 37, ¶ 1.

2. On November 11, 2024, a Motion was filed seeking withdrawal of Daniel R. Woods, James R. Rozak, the law firm Goldberg Segalla LLP, as well as Mr. Matuszewski. Dkt. No. 37. On November 19, 2024, that Motion was granted by minute entry. *See* Dkt. No. 39. While Mr. Matuszewski had the understanding that the grant of the motion would have granted his withdrawal, Mr. Matuszewski now understands that the only attorneys withdrawn by the minute order were Mr. Woods and Mr. Rozak (and not Mr. Matuszewski).

3. Since June 2024, Mr. Matuszewski has had no contact with Defendant Forever Companies, Inc., counsel for Plaintiff GM Casting House Inc., and the additional counsel for Defendant, Edmund Ferdinand III, at Meister Seelig & Fein PLLC. *See id.* at ¶ 4; *see also* Dkt. No 38, at pp. 1-2 (indicating that counsel for plaintiff conferred only with Mr. Ferdinand and Mr.

Woods and not with Mr. Matuszewski); Dkt. No. 41, at p. 2 (same); Dkt. No. 44, at p. 2 (referring to Dkt. No. 38); Dkt. No. 46 (indicating that “Defendant Forever Companies, Inc. is directed to appear at the hearing through newly retained counsel or a representative of the company.”).

4. Mr. Matuszewski is not, and has never been, associated with the current defense counsel, Mr. Ferdinand, and has not been involved in this case in any respect since he left the employ of Goldberg Segalla in June 2024.

5. Mr. Matuszewski thus respectfully moves the Court to withdraw him from this case as an attorney of record. This request is being made pursuant to L.R. 83.17, as Defendant previously requested “the withdrawal of Goldberg Segalla LLP and its attorneys as Defendant’s counsel” and to clarify that Mr. Matuszewski no longer represents Defendant and has had no involvement with this case since June 2024. *See id.* If this Motion is granted, Defendant Forever Companies, Inc. will still be represented by Mr. Ferdinand.

6. Before filing this Motion, Mr. Matuszewski contacted counsel for Plaintiff GM Casting House Inc. and Mr. Ferdinand for Defendant about this Motion. Mr. Ferdinand and counsel for Plaintiff do not oppose this Motion.

WHEREFORE, Movant Kenneth A. Matuszewski requests that this Court enter an order permitting the withdrawal of Kenneth A. Matuszewski and as an attorney for Defendant Forever Companies, Inc. in this case.

Dated: March 7, 2025

Respectfully submitted,

By: /s/ Kenneth A. Matuszewski

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One of the Attorneys for Defendant Forever Companies, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this date, I caused to be electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which caused it to be served this day on all counsel of record who are registered to receive email Notices of Electronic Filing generated by the CM/ECF system.

Date: March 7, 2025

/s/ Kenneth A. Matuszewski

Kenneth A. Matuszewski